

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE FEDERAL REPUBLIC OF NIGERIA, et al., <p style="text-align: center;">Applicant,</p> <p style="text-align: center;">v.</p> VR ADVISORY SERVICES, LTD., ET AL., Respondents.	X : : : : : : : : : : X	Case No. 1:20-mc-209-LGS-VF
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**The VR Respondents' Notice of Motion for Reconsideration
of the Court's Order dated December 13, 2022 (ECF 76)**

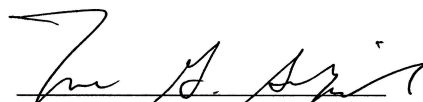
Please take notice that, pursuant to this Court's Local Civil Rule 6.3 and Sections III(A)(3) and III(B)(1) of the Individual Rules and Procedures for Civil Cases of the Honorable Lorna G. Schofield, the VR Respondents¹ respectfully move this Court to reconsider its order, dated December 13, 2022 (the "Order"). Specifically, the VR Respondents request the Court reconsider the Order in part and limit the Order, as to search terms ordered, to those search terms that Nigeria proposed in the Parties' most recent Joint Letter to the Court, ECF 75-2.

The points and authorities supporting this motion are set forth in the accompanying memorandum of law.

Date: December 27, 2022

Application **DENIED** as moot. The Order dated December 13, 2022, granted discovery only as to "non-privileged, relevant documents **requested at Dkt. No. 75-2**, which is Applicants' narrowed request, with certain exceptions as set forth below" (Dkt. No. 76 at 5). The scope of discovery did not extend to those search terms proposed at Dkt. No. 58-2, which are the subject of this motion.

Dated: December 28, 2022
New York, New York


LORNA G. SCHOFIELD
 UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Jeffrey W. Chivers

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¹ The VR Respondents are VR Advisory Services, Ltd., VR Advisory Services (USA) LLC, VR Global Onshore Fund, L.P., VR Argentina Recovery Onshore Fund II, L.P., Jeffrey Johnson, and Ashok Raju.

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